

Application No. 09/761,604
Reply to Office Action from August 16, 2005

Page 2 of 14

REMARKS/DISCUSSION OF ISSUES

Claims 1, 3, 5 through 11, 13, and 14 are pending in this application.

Rejections under 35 USC § 103 (a)

Claims 1, 3, 5 through 11, 13, and 14 were rejected under 35 USC 103 (a) as being unpatentable over Tavor, US # 2001/0032077A1 in view of Mikurak, US 2004/0064351 A1. The rejections of the claims are respectfully traversed.

Response to Arguments

To establish a prima facie case of obviousness, three basic criteria must be met. There must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, not in applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). (MPEP 2143).

The applicants will demonstrate that the combination of references does not result in the claimed invention.

Claims 1, 3, 13-14

The Tavor reference

In making the rejection, the examiner stated that:

"As per claims 1, 3 and 13-14, Tavor teaches 'developing feature text snippets for each feature, the snippets being phrases to be used when describing ... product features' (see abstract) 'developing user profile text snippets ... generic phrases ...' (see page 4, paragraphs [0049]-[0052])."

The Applicants respectfully disagree with this and reiterate the arguments against this reading of the Tavor reference as follows.

The Tavor reference is a program which uses natural language to directly compare two products which are selected from a group of products. Standard texts and relative statements are combined into sentences which compare selected products in a form such as, "*bigger than...*" or

Application No. 09/761,604
Reply to Office Action from August 16, 2005

Page 3 of 14

"rather sweet", or *"a bit sweeter than..."* (Paragraph [21]). The Tavor specification is strictly described in terms of an algorithm to return a textual comparison between specified products based on a relation between the products. Although Tavor's generated descriptions use phrases that are keyed to particular product features, it does not take the user's preferences or requirements into account when deciding which features are most important to talk about, or how to combine feature descriptions with generic phrases (e.g. *"but"*, *"although"*) in order to create a recommendation that is personalized for the user. Tavor also does not generate any text related to user profiles, i.e. combinations of features that are important for specific purposes or types of users (e.g. *"...which is important if you just want to take vaction snapshots"*). There is nothing in *"cmp_data(Topic, Value, ProductName)"* which has any relation to specific users or their preferences or profiles.

The paragraphs cited by the Examiner in Tavor (Paragraphs [49] – [52]) as supporting his contention that Tavor teaches feature text snippets and user profile text snippets, do not describe or suggest the development, use or existence of user profile text snippets, as well as dynamically generated fluent text that is used to convey the results of product analyses which are claimed by the Applicants. Paragraph [49] in Tavor just describes replacing variables and constructing strings in the abstract. Paragraph [50] indicates that the data passed to the routine *"Update_Compare_Text"* is a string processed by the routine described in the last paragraph, a list of products, and a string representing the type of information in the previous string (*"similar products"*, *"additional info for products"*, etc.). Paragraph [51] describes how strings are strung together to form a unified sentence (i.e. if the string *"p1 is bigger than p2"* is added to an existing string *"p1 and p2 are big"*, the result is *"Although both p1 and p2 are big, p1 is bigger than p2"*). Paragraph [52] names the main procedure of the program, and indicates that it calls the other processes described earlier. Paragraph [53] states that for the comparison technique proposed by Tavor, certain data fragments will not appear in the output as a function of relational compare vs. the standard comparison technique. Finally, Paragraph [54] describes the assembly of the textual output of the program. It uses similar product information and the topic-value pairs to prepare a textual comparison between specified products based on a relation between the products.

Nowhere in Tavor's method are user profiles, user preferences or requirements mentioned or used. Similarly, generation of dynamic fluent text output is not described or claimed in Paragraph [54] or anywhere else in Tavor. In contrast, Applicants' method is generating dynamic fluent text output with recommendations based on user preferences and requirements (profiles).

To further illustrate this point, paragraph [45] of the Tavor reference presents an example of Tavor's text output with the following phrases:

"... a product has a blue color, a round shape, a big size...; ... a product is blue, big, round; ... a product is a shirt, a computer, an apple...; ... a product is of a Big Cheese kind, an Expensive look ...; ... a blue product, a big product, a fast product... ; a big screen product, a high resolution

Application No. 09/761,604
Reply to Office Action from August 16, 2005

Page 4 of 14

product, a top quality product...; ... a product is suitable for playing alone...; ... a product is suitable for a big room, a blue wallpaper, KX-456 cellular phone model...; ... a product is used for cooking...; ... a product has a center piece...; ... a product is not blue...; ...a product is made in USA...," etc.

It is clear from the above citation that Tavor's output is not producing a dynamically generated fluent text which is as described and claimed by the Applicants. Tavor is generating pseudo-natural language output which comprises short primitive phrases of the type "*Product A has Property B,*" or simple comparisons of the type "*Although both p1 and p2 are big, p1 is bigger than p2*". The Applicants' method, however, generates dynamic fluent text output with recommendations based on user preferences and requirements, as illustrated, for example, by paragraphs [65-66] and [68] of the application (in which user profile text snippets are here marked with bold face):

"... produce the following paragraphs: [65] The top overall pick is the Epson PhotoPC 650. It has the best collection of convenience features, **which is important if you just want to take vacation snapshots, without having to be a rocket scientist.** It has lower ratings in Portability and Image Quality, **which are also high on the list for the basic snapshot taker,** but has high scores in Storage and Connectivity."

From this example it is clear that the text that the Applicants generate to convey recommendations is human-like, coherently flowing text with appropriate and convincing rhetorical structure. This type of fluent recommendation text is completely different from that in the Tavor reference, and is not present in, nor anticipated by the Tavor reference. The sole point of similarity with Tavor is that Applicants' text sometimes includes statements that compare an individual feature between products, but this implicit comparison is subordinate to the overall goal of the texts, which is to explain how the products' features do or do not match the user's specific requirements. For example, the text may mention that a camera has "lower ratings in Portability and Image Quality" than one or more other models, but this is only of importance because (1) the user expressed an interest in these particular features; and (2) the ratings were assigned relative to the user's specific requirements (which might well call for *less* portability, presumably in tradeoff for other features such as a lower price, for some users). Tavor, by contrast, would generate the same feature-by-feature comparison statements regardless of which features the user was most interested in, and regardless of how they valued the presence or absence of each feature. In other words, users and their requirements do not play any role in Tavor's method and do not influence the product comparisons that are produced by it.

As can be seen, none of the necessary components of Applicants' method ~ user preferences and requirements, i.e. profiles; user profile text snippets; personalized recommendations based on user requirements and preferences from user profiles; or dynamically

Application No. 09/761,604
Reply to Office Action from August 16, 2005

Page 5 of 14

generated fluent text that is used to convey product recommendations – are even hinted at in paragraphs cited by the Examiner (or anywhere else in Tavor).

The Examiner partially acknowledged the above when he stated “Tavor does not teach ‘dynamically generated fluent text that is used to convey product analyses ... user profile text snippets produces personalized recommendation for the product featuring dynamically generated fluent text ... analysis and recommendation tailored to the user requirements and preferences.’” The Applicants agree with this statement by the Examiner.

The Mikurak reference

The examiner further stated that:

“Mikurak et al. teaches ‘dynamically generated fluent text that is used to convey product analyses ... user profile text snippets produces personalized recommendation for the product featuring dynamically generated fluent text ... analysis and recommendation tailored to the user requirements and preferences’ (see paragraphs [0883] - [0885], [1259], [2471] and [2531] - [2533]).” The Examiner further stated that it would have been obvious to combine the Tavor and Mikurak references in order “to address the comparison of products base[d] on a user’s preference” resulting in “the advantage of receiving relevant product data based [on] the individual’s profile in a user-friendly manner.”

The Applicants respectfully disagree.

The cited paragraphs [0883] - [0885] from the Mikurak reference are relating to an attempt to provide for a description of a comparison between different products and services as well as outputting a recommendation of the products and services based on the inputted needs or on user profile. However, there is no reference to, or suggestion of, or working description of the notion of “user profile text snippets” or “dynamically generated fluent text”, either in the cited paragraphs or elsewhere in the Mikurak reference. Nowhere does the Mikurak reference describe what could be construed as a *personalized recommendation featuring dynamically generated fluent text* – that is, a paragraph or paragraphs of text that explains in a rhetorically structured fashion *why* a given product is appropriate for the current customer, *based on his/her specific preferences*. An example of such a text would be the following:

“The top overall pick is the Epson PhotoPC 650. It has the best collection of convenience features, which is important if you just want to take vacation snapshots, without having to be a rocket scientist.”

This paragraph is the type of text that would be generated using the techniques taught by the Applicants’ invention – it uses user profile text snippets (e.g. “...*if you just want to take vacation*

Application No. 09/761,604
Reply to Office Action from August 16, 2005

Page 6 of 14

snapshots...") that are indexed to features of the described product, to generate a coherent explanation of how the product relates to the user's requirements.

A thorough review of the Mikurak reference, including, besides paragraphs cited by the Examiner, the specification, figures, and claims, reveals absence of "dynamically generated fluent text" which is presented as a coherent paragraph or paragraphs. In fact no enabling teaching of a method to generate even non-personalized, non-dynamically generated recommendation output text based on user preferences can be found in the cited paragraphs or the whole Mikurak reference.

Paragraph [1259] of the Mikurak reference further cited by the Examiner describes "...display including personalized stock tickers, links to corporate financial information, and an online brokerage service. Other shareholder services could include historical graphing of the performance of stocks over time." Applicants respectfully note that this paragraph contains no description related to Applicant's method of personalized recommendation of a product featuring dynamically generated fluent text that is used to convey a product analysis and recommendation tailored to the user requirements and preferences by the combination of generic phrases, feature text snippets, and user profile text snippets.

Paragraph [2471] of the Mikurak reference further cited by the Examiner describes collaborative filtering which determines "...clusters of users with similar interests, either by asking users explicitly or by observing user selections and actions to determine those interests implicitly. This is an effective technique for creating recommendations for products." Again, Applicants respectfully note that this paragraph contains no description related to Applicant's method of personalized recommendation of a product featuring dynamically generated fluent text that is used to convey a product analysis and recommendation tailored to the user requirements and preferences by the combination of generic phrases, feature text snippets, and user profile text snippets.

Finally, paragraphs [2531] - [2533] of the Mikurak reference cited by the Examiner describe an attempt to provide for a personalization of the recommendations based on the information captured from the user. Applicants respectfully note that this paragraph contains no description related to Applicant's method of personalized recommendation of a product featuring dynamically generated fluent text that is used to convey a product analysis and recommendation tailored to the user requirements and preferences by the combination of generic phrases, feature text snippets, and user profile text snippets. As can be seen, the necessary components of Applicants' method cited by the Examiner, including "dynamically generated fluent text that is

Application No. 09/761,604
Reply to Office Action from August 16, 2005

Page 7 of 14

used to convey product analyses ... user profile text snippets produces personalized recommendation for the product featuring dynamically generated fluent text ... analysis and recommendation tailored to the user requirements and preferences" are not present in the Mikurak reference. No concepts, methods, enabling descriptions, or examples corresponding to the Applicants' invention are provided by Mikurak.

Combination of Tavor and Mikurak references

Having shown how the Tavor and Mikurak references individually differ from the Applicants' method, let us now discuss their combination. The Applicants will further demonstrate that the combination of references does not result in the claimed invention.

The combination of references does not result in the claimed invention

A feature of the Applicants' invention is the development of product features and user profiles, with which both text snippets and scoring functions can be associated. More specifically, the Applicants' method teaches the following steps:

1. developing a set of features that apply to products in the class, and groupings of these features (paragraph [0024]);
2. developing and testing a scoring function for each feature, which is used to rank different products based on their values of that feature (paragraph [0025]);
3. developing and testing text "snippets" for each feature, which are phrases to be used by the Text Generator component of the Synthesizer when describing or referring to particular product features (paragraph [0026]);
4. developing and testing user profiles, which are collections of values of features that are considered to be suitable for different types of users of the product class (paragraph [0027]);
5. developing and testing text snippets for each user profile, which are phrases to be used by the Text Generator component of the Synthesizer when describing or referring to particular user profiles (paragraph [0028]) and dynamically generating fluent text output.

Among important components of the Applicants' method, missing from either the Tavor or Mikurak references or combination thereof, is the notion of associating product features and user profiles, on the one hand, and scoring functions and text snippets, on the other. This association is what allows the Applicants' invention to explain to the user *why* a given product is recommended,

Application No. 09/761,604
Reply to Office Action from August 16, 2005

Page 8 of 14

in terms of particular features and/or user profiles. Other components of the Applicants' method, missing from either the Tavor or Mikurak references, will be analyzed later.

To give an example, consider a recommendation for a digital camera, such as would be generated by the Applicants' invention (paragraph [0068]):

"The PhotoPC 650 has the most convenience features. Like the D-220L, it has auto focus and red eye reduction, and the highest zoom factor. But it is also the only model with rechargeable batteries. All three models have a self timer."

In order to generate this recommendation, the system must perform the following steps:

1. The Ranking Engine computes a score for each feature (auto focus, red eye reduction, zoom factor, rechargeable batteries, self timer).
2. These scores are passed to the Text Generator, which looks up an appropriate text snippet for each feature, depending on the score (e.g. for the zoom factor feature, given that the current product has the highest score on that attribute among the products selected for comparison, it would select the superlative snippet "[has] the highest zoom factor").
3. The text generator combines the feature snippets and other generic phrasing into a fluent, rhetorically structured paragraph, which includes appropriate connecting phrases such as "like the ...", "also", and "but".

This can be summarized by saying that the system takes as *input* a list of feature scores, and produces as *output* a paragraph of text composed primarily of feature text snippets.

The Applicants' method also extends this process to *user profiles* – for example, in the following example (paragraph [0065]):

"The top overall pick is the Epson PhotoPC 650. It has the best collection of convenience features, which is important if you just want to take vacation snapshots, without having to be a rocket scientist."

In this case a score is computed for the "snapshot taker" user profile, which is based on the scores for the individual features in the "convenience features" group. This score and user profile are associated with a user profile text snippet, "[which] is important if you want to take vacation snapshots, ...".

Again, in this case, the system takes as *input* a user profile score, and produces as *output* a paragraph of text composed primarily of user profile text snippets.

Now, let us consider the combination of the Tavor and Mikurak references and compare the result of this imaginary combination to the Applicants' method. First, Mikurak (paragraphs [0952] and [0960]) teaches a method of "utilizing the customer's profile to prioritize the features of a group of similar, competing products". In this method, "a plurality of items for purchase are displayed, from which the customer is allowed to select multiple, similar items", and the method "creates a hierarchy of the features of the items selected in accordance with the customer's profile". Finally, "... a comparison table is presented with the features organized in a prioritized manner in accordance with the hierarchy. A particular item may be chosen, and similar competing items would be compared to it."

Applying this method to one of the digital camera examples given above, the result would be a comparison table something like the one shown below:

	Epson PhotoPC 650	Nikon D-220L	Fuji Finepix F-410
Auto focus	Yes	Yes	No
Red eye reduction	Yes	Yes	No
Zoom factor	3x	3x	2x
Rechargeable batteries	Yes	No	No
Self timer	Yes	Yes	Yes

The importance of this table as an aid to comparison shopping would be that it *prioritizes* the listed features for each product, according to the customer's profile, which "may be developed from many sources including customer input, ... customer's purpose of the pending sale, customer's shopping habits, etc." (paragraph [0952]). In other words, the features "Auto focus" and "Red eye reduction" would be listed first in the table, since the method has determined these features to be of maximum relevance for the current user, based on various information possibly including direct input from the customer. Similarly, other features, such as size or weight, might not appear in the table at all, if they were deemed to be of little importance to the user.

Now, obviously this comparison table makes no use of "dynamically generated fluent text that is used to convey product analyses" As discussed above, Tavor teaches the construction of pseudo-natural language output which comprises short primitive phrases of the type "*Product A has Property B,*" or simple comparisons of the type "*p1 is bigger than p2*". This output makes use of phrases defined for particular features – so hypothetically combining Tavor's method with that of Mikurak, instead of the above comparison table one might envision generating a textual comparison summary such as the following:

Product Comparison: Epson PhotoPC 650 / Nikon D-220L / Fuji Finepix F-410

Application No. 09/761,604
Reply to Office Action from August 16, 2005

Page 10 of 14

- The PhotoPC 650 and the D-220L have auto focus and red eye reduction; the Finepix F-410 does not.
- The PhotoPC 650 and the D-220L have a higher zoom factor than Finepix F-410.
- Only the PhotoPC 650 has rechargeable batteries.
- All three models have a self timer.

Again, this summary is *prioritized* according to the relevance of the various features for the current user (following Mikurak), but it cannot by any means be described as the Applicants' "dynamically generated fluent text that is used to convey product analyses and recommendations tailored to the user requirements and preferences", as we further demonstrate below.

The applicants wish to point out the following ways in which this hypothetical combination of the Tavor and Mikurak references differs crucially from the Applicants' method:

1. **No scoring functions for features** – Neither Tavor nor Mikurak teach the development of a scoring function for each product feature, which is used to rank different products based on their values of that feature (Applicants' paragraph [0025]). Mikurak teaches prioritization of features, i.e. determining *which* features are most relevant to a user, but teaches no method of quantifying the desirability of the *value* of a feature for that user (e.g. whether the user desires a large zoom factor or a small one). The Mikurak method might present the "Zoom factor" feature prominently to the user because of its derived relevance, but would do nothing to explain to the user how a high or low *value* of this feature related to the user's preferences or requirements, or user profile.
2. **No user profiles (in Applicants' sense)** – Similarly, neither Tavor nor Mikurak teach the development of user profiles, as defined by the Applicants. The Applicants define user profiles as "collections of values of features that are considered to be suitable for different types of users of the product class, and which can serve to help users of the product guide narrow down their product preferences quickly" (paragraph [0027]). Thus, an example of a user profile would be the "snapshot taker" profile, which consists of desired values for different features – e.g. "Yes" for Auto focus, Red eye reduction, and Self timer, and "3x" for Zoom factor. In the Mikurak reference, on the other hand, a "user profile" refers to a varied assortment of collected data about the user – including "customer input, customer buying habits, customer income level, customer searching habits, customer profession, customer education level, customer's purpose of the pending sale, ... etc." (paragraph [0952]). Nowhere is this linked to desired values of

Application No. 09/761,604
Reply to Office Action from August 16, 2005

Page 11 of 14

product features – again, Mikurak’s method might prioritize a feature (based on information such as the user having previously performed a search on a keyword like “zoom”), but Mikurak teaches nothing related to how values of a feature suit or do not suit individual users.

3. **No user profile text snippets** – Neither Tavor nor Mikurak teach the development of user profile text snippets – Tavor’s phrases are all indexed to product features, and Mikurak has no text snippets at all, including for “user profiles”, in the Applicants’ sense as described above.
4. **No fluent, rhetorically structured text** – With reference to the example text shown above, which could hypothetically be generated by a method that combined the Tavor and Mikurak references, clearly cannot be characterized as “fluent, rhetorically structured text”, in the sense of the Applicants’ method. This text is not rhetorically structured to provide product recommendations – that is, even though the content is expressed in complete, grammatical sentences, the generator has not applied rules to determine the best way of laying out the information in the sentences in order to convince the user of the suitability (or unsuitability) of a given product for their needs. This type of rhetorical structuring is at the heart of the Applicants’ method – the generated text must make use of phrases like however, also, etc.; sentence/phrase ordering; and user profile text snippets; in order to convey a message to the user about how the product’s features compare to the user’s particular requirement. In contrast, the hypothetical text above merely lays out the various feature values for the different product, and leaves it up to the user to sort out which feature values make the different products suitable or unsuitable for their needs.

In addition to the arguments presented before, and for the reasons just listed, the Applicants respectfully submit that any combination of the Tavor and Mikurak references, even if they are combinable, cannot result in “dynamically generated fluent text that is used to convey product analyses and recommendations tailored to the user requirements and preferences”. The reasons for this are reiterated and summarized as follows:

1. In the earlier discussion the Applicants’ method was characterized as taking as input a list of feature scores, and producing as output a paragraph of text composed primarily of feature text snippets. Similarly, it could take as input a user profile score, and produce as output a paragraph of text composed primarily of user profile text snippets.
2. Since the hypothetical Tavor/Mikurak combination would only address prioritization of features, as opposed to scoring of feature values with reference to

Application No. 09/761,604
Reply to Office Action from August 16, 2005

Page 12 of 14

the user's requirements, no corresponding output could be produced consisting primarily of feature text snippets. Similarly, since the Tavor/Mikurak hypothetical combination will not be able to address user profiles in the Applicants' sense (i.e. as collections of desired feature *values*) at all, much less user profile text snippets, neither could an output be produced composed primarily of user profile text snippets.

3. Therefore, hypothetical Tavor/Mikurak combination would not generate "recommendations tailored to the user requirements and preferences" – again, the generated texts would not be *recommendations*, in that they would simply present a list of product feature values for comparison by the user; and they would not be tailored to the user requirements and preferences, in the sense of being customized according to the feature *values* desired by the user.

Therefore, as the Applicants have demonstrated, the Tavor and Mikurak references either alone or in combination do not contain all of the components of the present invention. Accordingly, those skilled in the art would not be able to combine these references to develop the method of the present invention.

Therefore, it is respectfully suggested that the rejection of claims 1, 3, 5 through 11, 13, and 14 under 35 USC 103 (a) as being unpatentable over Tavor in view of Mikurak is overcome.

Claim 5

The examiner also stated that:

"As per claim 5, this claim is rejected on grounds corresponding to the arguments given above for rejected claim 1 and is similarly rejected including the following:

-- Tavor teaches 'testing the user profile text snippets' (see page 5, paragraphs [0057]-[0059])."

In addition to the arguments presented above, the Applicants note that there is nothing in the paragraphs cited by the Examiner which mentions user profile text snippets at all, nor is there anything about testing them. Claim 5 should be allowable for the same reasons as Claim 1, on which it depends, plus the additional limitation it contains.

Claim 6

The examiner also stated that:

"As per claim 6, this claim is rejected on grounds corresponding to the arguments given above for rejected claim 1 and is similarly rejected including the following:

Application No. 09/761,604
Reply to Office Action from August 16, 2005

Page 13 of 14

-- Tavor teaches 'providing access to the product recommendation ...' (see page 4, paragraphs [0058]-[0059])."

In addition to the arguments presented above, the Applicants argue that in the paragraphs cited by the Examiner and in the Tavor's whole reference, Tavor teaches comparisons between products. To the contrary, the Applicants' claim 6 does not involve providing access to product comparisons, only to personalized recommendations as claimed in Claim 1 on which Claim 6 depends. Claim 6 should also be allowable for the same reasons as Claim 1 on which it depends, plus the additional limitation it contains.

Claim 7

The examiner also stated that:

"As per claim 7, this claim is rejected on grounds corresponding to the arguments given above for rejected claim 1 and is similarly rejected including the following:

-- Tavor teaches 'a computer network ...' (see abstract)."

While Tavor does teach a computer network, the Applicants argue, in addition to the arguments presented above, that a computer network is only the first part of the Applicants' Claim 7. The entire claim should be considered in comparison to Tavor, and Tavor *does not* teach "providing customers with product recommendations over a computer network, by combining the generic phrases with feature text snippets and user profile text snippets to produce personalized recommendations for the products featuring dynamically generated fluent text that conveys product analyses and recommendations tailored to the user requirements and preferences." Claim 7 should be allowable for the same reasons as Claim 1 on which it depends, plus the additional limitation it contains.

Claims 8-11

The examiner also stated that:

"As per claims 8-11, these claims are rejected on grounds corresponding to the arguments given above for rejected claims 1-7 and are similarly rejected including the following:

-- Tavor teaches 'display and explanation of a comparison between several products' (see page 4, paragraphs [0050]-[0051])."

The Applicants respectfully disagree. In addition to the above arguments by the Applicants, and for the reasons cited above by the Applicants, Claims 8, 9, 10, and 11 are allowable over Tavor in view of Mikurak. In addition, the Applicants' method and claims does not claim comparison between several products as it is stated by the Examiner. To the contrary, Claims 8, 9, 10, and 11 claim providing personalized dynamically generated fluent text delivering product recommendations.

Application No. 09/761,604
Reply to Office Action from August 16, 2005

Page 14 of 14

Conclusion

Finally, the independent Claims 1 and 8 in the present application clearly provide for the method of the invention to prepare a personalized recommendation of a product featuring dynamically generated fluent text that is used to convey a product analysis and recommendation tailored to the user requirements and preferences by the combination of generic phrases, feature text snippets, and user profile text snippets. Neither the Tavor reference, nor the Mikurak reference, nor the combination of these two references, shows or suggests all of the features of the Applicants' method.

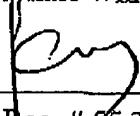
Therefore, it is respectfully suggested that the rejection of independent Claims 1 and 8 under 35 USC 103 (a) as being unpatentable over Tavor in view of Mikurak is overcome. Dependent Claims 3, 5-7, 9-11, and 13-14, being dependent upon and further limiting independent Claims 1 and 8, should also be allowable for the same reasons, as well as for additional limitations they contain. Reconsideration and withdrawal of the rejection are respectfully requested.

The Applicants believe that the claims are patentable over the prior art, and that the case is in condition for allowance of all claims therein. Such action is thus respectfully requested.

Respectfully submitted:

David Caldwell, Michael White, and Tanya Korelsky

By: _____



November 16, 2005

Leo B. Kriksunov, Reg. # 55,346

Patent Agent for the Applicants

Pastel Law Firm

8 Perry Lane, Ithaca, NY 14850

607.277.5907

**This Page is Inserted by IFW Indexing and Scanning
Operations and is not part of the Official Record**

BEST AVAILABLE IMAGES

Defective images within this document are accurate representations of the original documents submitted by the applicant.

Defects in the images include but are not limited to the items checked:

- BLACK BORDERS**
- IMAGE CUT OFF AT TOP, BOTTOM OR SIDES**
- FADED TEXT OR DRAWING**
- BLURRED OR ILLEGIBLE TEXT OR DRAWING**
- SKEWED/SLANTED IMAGES**
- COLOR OR BLACK AND WHITE PHOTOGRAPHS**
- GRAY SCALE DOCUMENTS**
- LINES OR MARKS ON ORIGINAL DOCUMENT**
- REFERENCE(S) OR EXHIBIT(S) SUBMITTED ARE POOR QUALITY**
- OTHER: _____**

IMAGES ARE BEST AVAILABLE COPY.

As rescanning these documents will not correct the image problems checked, please do not report these problems to the IFW Image Problem Mailbox.